

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
CORE SCIENTIFIC, <i>et al.</i> , ¹)	
)	Case No. 22-90341 (DRJ)
)	
Debtors.)	(Jointly Administered)
)	Re: Docket No. 505

**CERTIFICATE OF NO OBJECTION
REGARDING APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF
WILLKIE FARR & GALLAGHER LLP AS COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF JANUARY 9, 2023**

1. On February 8, 2023, the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned cases filed the *Application for Entry of an Order Authorizing the Retention and Employment of Willkie Farr & Gallagher LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of January 9, 2023* [Docket No. 505] (the “Application”),² with a proposed order granting the relief requested in the Application (the “Proposed Order”), the Trompeter Declaration attached thereto as Exhibit B, and the Miller Declaration attached thereto as Exhibit C. Objections to the Application were required to be filed and served on or prior to March 1, 2023 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisition, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisitions I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

² Capitalized terms used but not others defined herein shall have the meanings ascribed to them in the Application.

2. Following the filing of the Application, the Committee received certain informal comments from the U.S. Trustee and made corresponding revisions to the Proposed Order. A revised Proposed Order is annexed hereto as **Exhibit A** (the “Revised Proposed Order”). A redline of the Revised Proposed Order marked against the Proposed Order is annexed hereto as **Exhibit B**.

3. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (a) the Objection Deadline has passed, (b) the undersigned counsel is unaware of any objection to the Application, and (c) the undersigned counsel has reviewed the Court’s docket and no objection to the Application appears thereon.

4. Therefore, the Committee and Willkie Farr & Gallagher LLP respectfully request entry of the Revised Proposed Order.

[Remainder of page intentionally left blank]

Dated: Houston, Texas
March 2, 2023

Respectfully Submitted,

WILLKIE FARR & GALLAGHER LLP

By: /s/ Jennifer J. Hardy

Jennifer J. Hardy (Texas Bar No. 24096068)

600 Travis Street

Houston, Texas 77002

Telephone: 713-510-1700

Facsimile: 713-510-1799

Email: jhardy2@willkie.com

AND

Brett H. Miller (admitted *pro hac vice*)

Todd M. Goren (admitted *pro hac vice*)

James H. Burbage (admitted *pro hac vice*)

787 Seventh Avenue

New York, New York 10019

Telephone: 212-728-8000

Facsimile: 212-728-8111

Email: bmiller@willkie.com

tgoren@willkie.com

jburbage@willkie.com

*Proposed Counsel to the Official Committee of
Unsecured Creditors*

Certificate of Service

I certify that on March 2, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

By: /s/ Jennifer J. Hardy
Jennifer J. Hardy